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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF ARATI FURNESS IN
 SUPPORT OF NACHAWATI LAW
 GROUP PLAINTIFFS' OPPOSITION TO
 DEFENDANTS UBER TECHNOLOGIES,
 INC., RASIER, LLC, AND RASIER-CA,
 LLC'S MOTION TO DISMISS CASES FOR
 FAILURE TO COMPLY WITH PTO 5**

This Document Relates to:

*Jane Doe NLG 2 (S.G.) v. Uber Technologies,
 Inc., et al., No. 3:25-cv-08707-CRB*

*Jane Doe NLG 3 (B.G.) v. Uber Technologies,
 Inc., et al., No. 3:25-cv-08732-CRB*

*Jane Doe NLG 2 (J.H.) v. Uber Technologies,
 Inc., et al., No. 3:25-cv-08736-CRB*

*Jane Doe NLG (V.S.) v. Uber Technologies, Inc.,
 et al., No. 3:25-cv-08757-CRB*

*Jane Doe NLG 3 (P.L.) v. Uber Technologies,
 Inc., et al., No. 3:25-cv-08865-CRB*

*Jane Doe NLG (M.S.) v. Uber Technologies, Inc.,
 et al., No. 3:25-cv-09006-CRB*

*Jane Doe NLG (A.B.) v. Uber Technologies, Inc.,
 et al., No. 3:25-cv-09180-CRB*

Jane Doe NLG (M.O.) v. Uber Technologies,

Judge: Honorable Charles R. Breyer
 Date: February 13, 2026
 Time: 10:00 a.m.
 Courtroom: 6 – 17th Floor

Inc., et al., No. 3:25-cv-09181-CRB

Jane Doe NLG (R.R.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09182-CRB

Jane Doe NLG (K.G.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09184-CRB

Jane Doe NLG (J.R.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09186-CRB

Jane Doe NLG (T.J.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09193-CRB

Jane Doe NLG (C.P.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09194-CRB

Jane Doe NLG (R.M.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09197-CRB

Jane Doe NLG (A.G.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09205-CRB

Jane Doe NLG (C.B.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09213-CRB

Jane Doe NLG (G.Z.) v. Uber Technologies, Inc., et al., No. 3:25-cv-09315-CRB

DECLARATION OF ARATI FURNESS

I, Arati Furness, declare as follows:

1. I am an attorney who is admitted to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the Plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Motion to Dismiss Cases for Failure to Comply with PTO 5. ECF 4854. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with PTO 5. I make this declaration based on my own personal

1 knowledge. If called upon to testify, I could and would testify competently to the truth
2 of the matters stated herein.

- 3 2. Our office has made significant effort to reach these Plaintiffs including numerous
4 phone calls, emails, texts, letters, and/or address searches.
5
6 3. The following Plaintiffs have submitted ride documentation and are therefore in
7 compliance with PTO 5, as follows:

8 (a) Plaintiffs Jane Doe NLG 3 (P.L.), Jane Doe NLG (C.P.), and Jane Doe NLG
9 (A.G.)'s ride receipts were submitted and produced on January 5, 2026.

10 (b) Plaintiff Jane Doe NLG (T.J.)'s ride receipt was submitted and produced on
11 January 14, 2026.

12 (c) Plaintiff Jane Doe NLG (R.R.)'s ride information form was submitted and
13 produced on January 13, 2026.

14 (d) Plaintiff Jane Doe NLG 3 (B.G.)'s ride receipt was submitted and produced on
15 January 13, 2026, under plaintiff portal ID 4190 (Case No. 3:25-cv-08732).
16 Plaintiff portal ID 4633 is duplicative and we have requested deactivation.

17 (e) Plaintiff Jane Doe NLG (K.G.)'s ride receipt was submitted and produced on
18 January 13, 2026, under plaintiff portal ID 4407 (Case No. 3:25-cv-09184).
19 Plaintiff portal ID 4592 is duplicative and we have requested deactivation.

20 (f) Plaintiff Jane Doe NLG (G.Z.)'s ride receipt was submitted and produced on
21 January 14, 2026, under plaintiff portal ID 4144 (Case No. 3:25-cv-09315).
22 Plaintiff portal ID 4599 is duplicative and we have requested deactivation.

- 23 4. Counsel would therefore dispute their inclusion on Defendants' list of delinquencies
24 for their Motion, as well as respectfully request for their exclusion on any future entry
25 of dismissal by the Court.

26 Executed on January 14, 2026, in Dallas, Texas.

27 **NACHAWATI LAW GROUP**

28 /s/ Arati Furness

Arati Furness (CA Bar No. 225435)